

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Jean Dickinson, Director

September 22, 2008

SEP 3 0 2008

Cindy Guzman, Program Consultant Civil Rights Bureau Office of Human Rights 744 P Street MIL Station 6-70 Sacramento, CA 95814

Dear Ms. Guzman:

In response to the Civil Rights Compliance Review findings, enclosed is Inyo County's Corrective Action Plan. Your thoughts comments and suggestions are welcome. If you have any questions about the plan, you may reach me at (760) 872-4245.

Sincerely,

Leah M. Bovee, CRC

Inyo County Health and Human Services

Civil Rights Division 21

Corrective Action Plan

For June 2008 Site Review

Corrective Action Plan

Overview of Findings

The State Civil Rights 2008 site visit review revealed some non-compliance issues surrounding ADA at the Lone Pine, Grove St. and 912 No. Main St. locations. Citing's identified during the review at the locations surrounded ADA parking requirements and specifications, directional signage, counter heights, and exterior door pressure. It was also noted that charts lacked methods used to provide bilingual services, information identifying an applicant/recipient as disabled, and the applicant/recipient's request for auxiliary aids and services. Last, staff interviews revealed not all staff understands the difference between program discrimination and personnel complaints.

The purpose of this corrective action plan is to address deficiencies identified from the review and provide a time line for completion of all corrective actions and recommendations.

Corrective Action

The CRC has met with upper management to discuss the plan for correcting the identified issues. Some items can be immediately rectified whereas others will take time. Work Orders (Exhibit A) have been drawn up and submitted to our Public Works Department (Public Works) with a requested completion date of March 31, 2009. Shortly after work order submission, Public Works responded in a memo stating our request could not be achieved due to their current staffing levels, workload, and funding. It was suggested by their department that the work be sent out for bid. At this time, the CRC will plan for the work to be contracted out as necessary, in addition to utilizing any possible assistance from our Public Works Department. A copy of the memo is attached as Exhibit B.

Timeline

Inyo County Social Services expects all contracted work to be completed by April 31, 2011. This time frame should serve to be adequate for the CRC and upper management to: (1) contact the various necessary county departments for outsourcing protocol, (2) conduct the bid and award process, and (3) complete the work. Since we are a small community, and resources few, there is a possibility that multiple contractors would be involved in the work and projecting a sooner timeline would be difficult. Some items have already begun to be addressed (in process) and/or are completed.

Facility Location Findings

Dissemination of Information

The 912 No. Main St., Bishop location was found to be in need of directional signage not only in English, but other appropriate languages. Likewise, the Lone Pine facility needed the "No Public Restrooms" sign to also be in Spanish.

Signage for both locations is now in both English and Spanish. This was verified complete by the CRC via phone conversation with Lone Pine staff and a facility visit to 912 No. Main St. on August 8, 2008.

Discrimination Complaint Procedures

Most of the employees interviewed knew the difference between program discrimination and a personnel complaint. Few however, did not understand the difference between the three types of complaints. With this knowledge, the CRC plans to spend more time with this section of civil rights training by providing clearer examples of the different type of complaints (personnel, program and discrimination) during the trainings.

Documentation of Applicant/Recipient Case Records

Selected cases for this review did not contain sufficient documentation indicating if the client provided their own interpreter, documentation of their primary language, or if bilingual services were provided. Staff must ensure that proper documentation is kept in the file identifying all required elements for compliance.

In late spring of 2008, the CRC created and submitted with the annual civil rights plan language forms complying with Division 21 regulations. The form was implemented prior to the review and cases selected doubtfully had these forms. With the implementation of this form, all cases have now been required to contain the language forms.

ADA Exterior Entry Signage

The International Symbol of Accessibility is required at every main entrance. Both the Grove St. and Lone Pine buildings were observed lacking this symbol. Since the review, signs were ordered and are now ready and available to be placed at each location's main entry. The signs will be placed at the entry doors at each location by the end of September.

It was noted that several issues in this review were repeat findings from previous site visits. Inyo County will work together as needed with the property owners and contractors to ensure corrections to the facilities are completed by April 31, 2011.

The 912 No. Main St.

Exterior door pressure will be adjusted to a maximum of 5 pounds of pressure. A work order was submitted in early summer for adjusting height of toilet seat protector (awaiting word on status). Last, "unauthorized parking " signage will be placed in a conspicuous place at the entrance to off street parking. Rather than reconfigure present parking, the county will consider Ms. Guzman's recommendations to relocate the Van Accessible parking near primary entrance and according to ADA specifications

162 J. Grove St.

Exterior door pressure will be adjusted to a maximum of 5 pounds of pressure. The height of the lobby counter will be modified between 28" to 34" from floor finish. The restroom (unisex) will have accessible signage placed on wall as required. Current Van Accessible parking space will need to be relocated, as the City of Bishop will be widening the street, thus removing all parking spaces at the north side of the building. The CRC will work with management to determine the nearest and safest location to the main entrance for a new parking spot. The new location will meet ADA specifications.

380 N. Whitney St. - Lone Pine

Exterior door pressure will be adjusted to a maximum of 5 pounds of pressure. The height of the client lobby counter will be modified between 28" to 34" from floor finish. The county will move on Ms. Guzman's recommendation to place a 28" to 34" tall table in the lobby temporarily until the counter height has been modified to meet ADA specifications. Finally, Van Accessible parking will be relocated to the shortest accessible route according to ADA specifications.

Conclusion

Inyo County Social Services takes pride in the fact that there have been no discrimination complaints in several years. Every effort will be taken to continue to deliver excellent service to our culturally diverse population. It is important that our population's civil rights are protected and we will do all we can to ensure those rights remain protected.

WORK ORDER MAINTENANCE BUILDING AND GROUNDS	
TO: DEPARTMENT OF PUBLIC WORKS DATE: EMAIL TO: bidgsmaintworkerder@inyocounty.us	August 8, 2008
FROM (DEPT.): HEALTH & HUMAN SERVICES	
CONTACT PERSON: LEAH BOVEE	11 AS SOON AS POSSIBLE
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EXHIBIT A

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WORK ORDER MAINTENANCE BUILDING AND GROUNDS TO: DEPARTMENT OF PUBLIC WORKS DATE: August 11, 2008 EMAIL TO: bldgsmaintworkorder@inyocounty.us a) Dickenson FROM (DEPT.): HEALTH & HUMAN SERVICES [] EMERGENCY CONTACT PERSON: LEAH BOVEE AS SOON AS POSSIBLE PHONE EXTENTION: 872-4245 [] CONTACT THIS DEPT. BEFORE STARTING WORK PLEASE PERFORM THE FOLLOWING MAINTENANCE / REPAIR WORK: BUILDINGS: 162 J. GROVE ST., & 912 N. MAIN ST - BISHOP AND 380 N. MT. WHITNEY, LONE PIN SUBJECT: AUTOMATIC DOORS QUOTE ONLY: PRICE FOR PURCHASE AND INSTALLATION OF AUTOMATIC DOORS AT THE THREE LOCATIONS. DOORS TO MEET ADA GUIDELINES. DO NOT WRITE BELOW THIS LINE. PUBLIC WORKS USE ONLY DATE STARTED: DATE COMPLETED: MATERIALS USED: COMMENTS:

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MEMORANDUM

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Jean Dickerson, Health and Human Services Director

FROM

Mike Conklin, Deputy Director Public Works CALL

CC:

Leah Boses John Jones

DATE

August 20, 2008

SUBJECT:

ADA Compliance



We are in receipt of your request to make certain modifications to achieve ADA compliance at various Health and Human Services facilities throughout the County. Regrettably, given our current statting levels, workload, and funding, we cannot achieve your request. It would be our recommendation to solicit other means by which to accomplish your goal. Our suggestion would be to contact various contractors throughout the community and obtain a price to do the work outlined in the work orders.

If we can be of any assistance in this regard, clease contact us-

EXHIBIT B